

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

SIR EDWARD THOMAS, SR.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 3:14-CV-581
)	JURY TRIAL DEMANDED
CORRECT CARE SOLUTIONS, LLC,)	
Defendant.)	

RESPONSE TO MOTION TO DISMISS

COMES NOW the Plaintiff, Sir Edward Thomas, Sr., by counsel, responding to the Motion to Dismiss Count III of the Complaint and hereby states as follows:

- 1) The legal arguments contained in the defendant's brief are sound all well taken;
- 2) The plaintiff hereby concedes the legal accuracy and effect of such argument.

WHEREFORE, the plaintiff has no opposition to the Motion to Dismiss Count III

SIR EDWARD THOMAS, SR.

/s/David P. Morgan

By Counsel

David Paul Morgan, Esq. (VSB #70211)

MARCARI RUSSOTTO SPENCER & BALABAN
P.C.

1 PARK WEST CIRCLE, SUITE 101

MIDLOTHIAN, VA 23114

(804)307-6584

davidm@mrslawfirm.com

CERTIFICATE

I certify that a copy of this Response to Motion to Dismiss has been delivered to all parties in interest by this Court's ECF/NEF system.

/s/David P. Morgan
David Paul Morgan, Esq. (VSB #70211)
MARCARI RUSSOTTO SPENCER & BALABAN
P.C.
1 PARK WEST CIRCLE, SUITE 101
MIDLOTHIAN, VA 23114
(804)307-6584
davidm@mrslawfirm.com